

EXHIBIT A

(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**ORDER GRANTING MOTION OF TERRAFORM LABS PTE LTD. FOR LEAVE TO
SERVE RULE 45 DOCUMENT SUBPOENA(S) ON DEBTORS**

Upon consideration of the *Motion of Terraform Labs PTE Ltd. for Leave to Serve Rule 45 Document Subpoena(s) on Debtors* (the “Motion”);² and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012; and this Court having found that this is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the U.S. Constitution; and this Court having found venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion and in any corresponding

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

declaration establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is **GRANTED** in its entirety.
2. TFL is hereby authorized to serve and effectuate the discovery outlined in the Motion upon Debtor Celsius Network Inc., inclusive of any of its affiliates or subsidiaries within its control, which may include but is not limited to one or more of the Debtors. Such discovery as outlined in the Motion does not violate the automatic stay under 11 U.S.C. § 362(a).
3. The automatic stay imposed by 11 U.S.C. § 362(a), to the extent applicable, is hereby modified solely to the extent necessary for TFL to serve and effectuate the discovery outlined in the Motion upon the Debtors.
4. Any relief from the automatic stay shall be effective immediately upon entry of this Order and any stay period under the Federal Rules of Bankruptcy Procedure shall not apply.
5. Debtors can designate any production made in response to the discovery served by TFL pursuant to the Protective Order entered in the SEC Action, submitted as Exhibit D to the Motion.
6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this Order.

Date: August __, 2023

MARTIN GLENN
Chief United States Bankruptcy Judge